

State of New Jersey

Christine Todd Whitman Governor

Department of Environmental Protection

Robert C. Shinn, Jr. Commissioner

Mr. Cristopher Anderson Director, Environmental Affairs L.E. Carpenter & Company 200 Public Square Suite 36-5000 Cleveland, OH 44114-2304

DEC 21 1998

Dear Mr. Anderson:

Re: L.E. Carpenter Superfund Site Wharton, Morris County

The New Jersey Department of Environmental Protection (Department) and EPA have reviewed the Workplan to Implement Further Investigative and Remedial Action at MW-19/Hot Spot 1, Hot Spot B and C, and Hot Spot 4 prepared by RMT, Inc. dated November 1998 and have the following comments:

- 1. MW-19/Hot Spot 1 Complete delineation of the organic contaminant plume is the objective of the proposed investigation, however, this may not be possible with the three monitoring wells as proposed. Therefore, the work plan should outline a prior ground water screening investigation, in the nature of geoprobe, hydro punch, or other similar methodology, in the downgradient area before the installation of permanent monitoring wells. The screening, if conducted properly, would provide valuable information necessary to ensure complete delineation of the organic plume, and could reduce or eliminate the need for locating additional monitoring wells in the near future.
- 2. Hot Spots B and C RMT proposes to utilize a grid sampling approach. A map must be provided that includes previous soil sample points (i.e., lead post-excavation soil samples) along with the proposed grid sample points. In addition, the work plan states that field observations will be used to select samples for lead analysis. It is recommended that field screening be used in order to more accurately determine what samples should be analyzed.

Please note that once the field work is completed, lead soil data from the proposed sampling event as well as all historical lead soil data for the entire site must be presented on a comprehensive site map.

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Please feel free to contact me at (609) 633-7261 if you have any questions.

Sincerely,

Gwen B. Zervas, P.E.

Case Manager

Bureau of Federal Case Management

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C: Stephen Cipot, EPA George Blyskun, BGWPA John Prendergast, BEERA